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*ADMITTED IN NY & NJ

March 2, 2023

BY ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Markin, et al*, 22 CR 395
Seth Markin - Defendant

Your Honor:

I write to request that the defendant's travel restrictions be modified to permit him to attend a Tattoo Arts Convention, together with friends, in Baltimore, Maryland from April 20, 2023 through April 24, 2023.

Background

On July 21, 2022, the defendant was named in the instant Indictment. The Indictment charges him with Conspiracy and substantive counts of Securities Fraud and Tender Offer Fraud based upon allegations that he misappropriated material non-public information relating to plans by Merck & Company, a publicly traded pharmaceutical company, to acquire Pandion Therapeutics, a publicly traded biotechnology company; and, that the defendant purchased Pandion stock and encouraged others to do so based upon this information.

On or about July 25, 2022, the defendant was arraigned to the instant Indictment. He was released on an unsecured bond of \$200,000, co-signed by the defendant's parents. The defendant's travel is limited to the Southern District of New York, the Eastern District of New York, the District of New Jersey, and the Eastern District of Pennsylvania, where the defendant resides with his parents.

In or about September of 2022, the Court approved the defendant's prior request to attend a Tattoo Arts convention in Asheville, North Carolina from November 1 through November 8, 2022. Mr. Markin participated in that convention without incident.

I have spoken to Janitza Gomez, the Pretrial Services Officer tasked with monitoring the defendant's compliance with his bail conditions. She informs me that he has been fully compliant with the terms of his bail; and, that she will have no objection to the request that follows.

The Instant Request

The defendant requests permission to attend the Tattoo Arts convention in Baltimore from April 20, 2023 through April 24, 2023.

The same group of friends that were present with the defendant at the earlier convention will be present on this occasion, as well. Prior to the defendant's departure, an itinerary of the defendant's trip, including hotel reservations, will be provided to Pretrial Services.

Conclusion

For all the reasons set forth herein, we respectfully request that the defendant be permitted to make the trip described above.

Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)

USPSC Janitza Gomez (by email)